

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LINDA FLINT EDGE,)	
Plaintiff,)	
)	
v.)	No. 04-12134 DPW
)	
NORFOLK FINANCIAL CORPORATION)	
and DANIEL W. GOLDSTONE,)	
Defendants.)	

**MOTION FOR LEAVE TO FILE REPLY MEMORANDUM TO DEFENDANT'S
OPPOSITION TO PLAINTIFF'S PETITION FOR ATTORNEY'S FEES**

The Plaintiff, Linda Flint Edge, by her attorney, moves this Court pursuant to Local Rule 7.1(B)(3) for leave to file a memorandum in reply to Defendants' Opposition to Petition for Attorney's Fees ("Defendants' Opposition"). In support of this motion, Plaintiff states as follows:

1. On May 10, 2005, Defendants filed Defendants' Offer of Judgment pursuant to Fed. R. Civ. P. 68 (Defendants' offer).
2. On May 17, 2005, Plaintiff filed her acceptance of Defendants' offer.
3. On May 18, 2005 this Court entered judgment on Plaintiff's acceptance of Defendants' offer.
4. On June 1, 2005, Plaintiff filed her Petition for Attorney's Fees ("Plaintiff's Petition") and Memorandum in Support of Plaintiff's Petition for Attorney's Fees.
5. On June 14 Defendants filed their Opposition to Petition for Attorney's Fees, which Plaintiff's counsel received by mail on June 15, 2005.
6. Defendants' Opposition raises matters outside Plaintiff's Petition and her supporting memorandum, which Plaintiff needs to address in reply.

7. Defendants' Opposition contains numerous factual inaccuracies and false suppositions that Plaintiff needs to correct for the Court and which require Plaintiff's counsel to file an additional affidavit to correct and clarify.

8. Defendants' would not be prejudiced by any delay caused by Plaintiff's filing of a reply.

WHEREFORE, Plaintiff respectfully requests this Court to allow her to file a memorandum in reply to Defendants' Opposition to Petition for Attorney's Fees on or before June 30, 2005.

Dated: June 16, 2005

s/Yvonne W. Rosmarin

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CERTIFICATE

Yvonne W. Rosmarin, attorney for the Plaintiff, hereby certifies that counsel for the Plaintiff has attempted in good faith to confer with counsel for the Defendants to obtain assent to this motion, but Defendants refused to assent to this motion.

s/Yvonne W. Rosmarin

Yvonne W. Rosmarin